

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GOYKE HEALTH CENTER, P.C.,)	
Individually and as the representative of a class)	
of similarly-situated persons,)	
)	
Plaintiff,)	
)	No. 08 CV 2705
v.)	
)	Judge Castillo
METLIFE, INC. and METLIFE SECURITIES,)	
INC.,)	
)	
Defendants.)	

**JOINT MOTION TO REINSTATE FOR SOLE PURPOSE
OF FILING STIPULATION OF DISMISSAL WITH PREJUDICE**

The parties hereby respectfully request that this Court reinstate this case for the sole purpose of allowing the parties to file a Stipulation of Dismissal with Prejudice and deem the Stipulation filed upon granting of this motion. In support of their motion, the parties state as follows:

1. Defendants removed this case to federal court on May 9, 2008.
2. On May 13, 2008, this Court dismissed the case without prejudice.
3. The parties subsequently settled the case and wish to reinstate the case solely for the purpose of entering a Stipulation of Dismissal with Prejudice, which is attached as Exhibit A.

WHEREFORE, the parties respectfully request that this Court reinstate the case for the sole purpose of entering the attached Stipulation of Dismissal with Prejudice and that the Court deem the Stipulation filed upon granting of this motion.

Respectfully submitted,

METLIFE, INC. and METLIFE
SECURITIES, INC.

By /s/ Steven P. Mandell
One of their attorneys

Steven P. Mandell
Brendan J. Healey
MANDELL MENKES LLC
333 W. Wacker Drive Suite 300
Chicago, Illinois 60606

DATED: August 29, 2008

GOYKE HEALTH CENTER, P.C.

By /s/ Peter S. Lubin
One of its attorneys

Vincent L. DiTommaso
Peter S. Lubin
Janice L. Morrison
DiTommaso ♦ Lubin, PC
17W 220 22nd Street – Suite 200
Oakbrook Terrace, Illinois 60181

Phillip A. Bock
Bock & Hatch, LLC
134 North LaSalle Street, Ste. 1000
Chicago, Illinois 60602

CERTIFICATE OF SERVICE

This is to certify that I have this date served a true and correct copy of the within and foregoing *Joint Motion to Reinstate for Sole Purpose of Filing Stipulation of Dismissal With Prejudice* by ECF to the following:

Vincent L. DiTommaso
Peter S. Lubin
Janice L. Morrison
DiTommaso ♦ Lubin, PC
17W 220 22nd Street – Suite 200
Oakbrook Terrace, Illinois 60181

Phillip A. Bock
Bock & Hatch, LLC
134 North LaSalle Street, Ste. 1000
Chicago, Illinois 60602

This 29th day of August, 2008.

/s/ Steven P. Mandell
Steven P. Mandell

#170419

EXHIBIT A

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METLIFE, INC. and METLIFE SECURITIES,)	
INC.,)	
)	
Defendants.)	

STIPULATION OF DISMISSAL WITH PREJUDICE

It is hereby Stipulated and Agreed, by and between the undersigned counsel for the parties, that the above captioned lawsuit, is dismissed with prejudice. Each party will bear its own costs, expenses and attorneys' fees.

Respectfully submitted,

METLIFE, INC. and METLIFE
SECURITIES, INC.

By /s/ Brendan J. Healey
One of their attorneys

Steven P. Mandell
Brendan J. Healey
MANDELL MENKES LLC
333 W. Wacker Drive Suite 300
Chicago, Illinois 60606

GOYKE HEALTH CENTER, P.C.

By /s/ Peter S. Lubin
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